

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

**WILLIAM DEAN, individually, on
behalf of himself and all others similarly
situated,**

Civ. No. 14-cv-00376 (DFW/JSM)

Plaintiff,

v.

**CITY OF MONTICELLO,
MINNESOTA,**

Defendant.

**PLAINTIFF'S MOTION TO PRELIMINARILY APPROVE
SETTLEMENT, CERTIFY A CLASS FOR SETTLEMENT PURPOSES,
APPROVE THE PARTIES' NOTICE PLAN AND SCHEDULE A FINAL
FAIRNESS HEARING**

Plaintiff William Dean ("Plaintiff") respectfully submits this Motion pursuant to Fed. R. Civ. P. 23 and supporting Memorandum for an Order: (1) preliminarily approving the negotiated settlement of Plaintiff's claims; (2) conditionally certifying a settlement class pursuant to Fed. R. Civ. P. 23; (3) approving the proposed Notice Plan, and (4) setting a Final Fairness Hearing date. The Settlement Agreement and Release, including the proposed form of Notice, is submitted herewith.

Dated: April 11, 2014

By: s/ Archana Nath

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